

# **WISHA REGIONAL DIRECTIVE**

**WISHA Services**

**Department of Labor and Industries**

**30.21**

## **Fall Protection Work Plan When Standard Guardrails Are Used Date: October 31, 2005**

### **I. Background**

WISHA Services has received many questions regarding when a fall protection work plan (FPWP) is required, especially if the only fall hazard is from a walking/working surface. Based on inquiries, Policy and Technical Services feels there is a need to clarify and establish policy regarding the applicability of the FPWP requirement when the trigger height of 10 feet is reached for walking/working surfaces that require standard guardrails or the equivalent for fall protection.

### **II. Scope and Application**

This regional directive provides guidance to WISHA consultation and enforcement staff regarding the requirement to develop a FPWP when an employer uses guardrails for fall protection. It replaces all previous guidance on the topic, whether formal or informal, and will remain in effect indefinitely.

### **III. Special Compliance and Consultation Protocols**

- A. *When employees are protected from falling by the use of standard guardrails as defined in WAC 296-155 Part K and the work location is 10 feet or greater above the ground or next adjacent surface, is a FPWP as described in WAC 296-155 Part C-1 required?*

WAC 296-155-505(6)(a) requires “Every open sided floor, platform or surface four feet or more above adjacent floor or ground level shall be guarded by standard railing or the equivalent...” Once an employer protects the open-sided floor, platform or surface that is 10 feet or more above an adjacent surface with standard guardrail as defined by Part K, WISHA consultation and enforcement staff must not cite the employer for failing to

address the surface in the FPWP. WISHA considers an employee protected by standard guardrails not to be exposed to a fall hazard.

During the erection of the guardrails on a surface 10 feet or more above an adjacent surface, employees must be protected from falling. Enforcement and consultation staff must appropriately apply the requirements of Chapter 296-155 WAC, Part C-1, including the requirement for a FPWP when employees are exposed to a fall hazard of 10 feet or greater.

- B. How should WISHA enforcement and consultation staff cite an employer when an employer chooses not to use standard guardrails to protect employees working on an open-sided surface that is 10 feet or more above an adjacent surface?*

When an employer chooses not to use standard guardrails for the protection of employees working on an open-sided surface that is 10 feet or more above an adjacent surface, but implements an alternative method, the FPWP requirements apply.

Approved: \_\_\_\_\_  
Mel James, Acting Senior Program Manager  
WISHA Policy & Technical Services

For further information about this or other WISHA Regional Directives, you may contact WISHA Policy & Technical Services at P.O. Box 44648, Olympia, WA 98504-4648 -- or by telephone at (360)902-5503. You also may review policy information on the WISHA Website (<http://www.lni.wa.gov/Safety/>).